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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	No. CR 11-814 JW
)	
Plaintiff,)	
)	SECOND STIPULATION AND
v.)	PROPOSED ORDER TO CONTINUE
)	SURRENDER DATE
)	
ROBIN O'CONNOR,)	
)	
Defendant.)	
)	

On March 26, 2012, defendant Robin O'Connor was sentenced by this Court to 21 months in custody. She was ordered to self-surrender on June 11, 2012. She specifically requested this date so that her two young children could finish the school year before she had to go into custody. On April 10, 2012, this Court granted Ms. O'Connor's request to change her self-surrender date to June 25 in order to assist with her family's move to San Diego.

Ms. O'Connor now comes before the Court requesting an additional brief continuance of her surrender date due to new developments in her family's circumstances. After she was given a custodial sentence, Ms. O'Connor and her husband made arrangements to move to San Diego so that Mr. O'Connor could keep his job and care for the children without having to move them to England. The family was scheduled to move in mid-June so that Ms. O'Connor could help

1 settle the children in their new home before she left to serve her sentence. However, Ms.
 2 O'Connor recently learned that the house they will be moving into in San Diego will now not be
 3 available for them to move into until July 9th. Therefore, all of the moving and unpacking will
 4 need to occur after that date, and Mr. O'Connor will continue to work full time throughout this
 5 process.

6 In addition, Ms. O'Connor is needed to provide childcare to her two young sons prior to
 7 the time they start school. Fortunately, they were able to enroll the kids in a year-round school,
 8 which will ease the burden of childcare for Mr. O'Connor. However, school does not start until
 9 July 16th, and until that date, the family does not have a full-time caretaker should Ms. O'Connor
 10 be in jail.

11 In light of the new circumstances set forth above, Ms. O'Connor requests one more brief
 12 continuance of her self-surrender date from June 25, 2012, to July 23, 2012. This additional time
 13 will allow her to assist her family make a smooth transition and move to a new city, make sure
 14 her sons are settled in their new school for their first week, and ease the burden on her husband,
 15 who will be the sole breadwinner and caregiver while she serves her sentence.

16 The government does not object to the defendant's request.

17 The parties hereby stipulate and agree that the self-surrender date for defendant Robin
 18 O'Connor be continued from June 25, 2012, to July 23, 2012, at 2:00 pm.

19 IT IS SO STIPULATED.

20 MELINDA HAAG
 21 United States Attorney

22 6/4/12

/s/

23 DATED

THOMAS STEVENS
 Assistant United States Attorney

24
 25
 26 STIP. & ~~PROPOSED~~ ORDER TO CONT.
 SURRENDER DATE
US v. O'Connor, 11-814 JW

1 GEOFFREY HANSEN

2 Acting Federal Public Defender

3 6/4/12

/s/

4 DATED

RITA BOSWORTH

Assistant Federal Public Defender

5
6 In light of the parties' stipulation, it is hereby ORDERED that the defendant's surrender
7 date of June 25, 2012, shall be VACATED, and a new surrender date of July 23, 2012, at 2:00
8 p.m. shall be imposed.
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10
11 June 12, 2012

12 DATED

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JAMES WARE
Chief United States District Judge

STIP. & ~~PROPOSED~~ ORDER TO CONT.
SURRENDER DATE
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